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Cc: [ANDERSON Jim M](#); [TARNOW Karen E](#)
Subject: Draft LWG FS Source Control Status Table
Date: 10/15/2010 12:49 PM
Attachments: [AOPC 1-14_08272010 for DEQ.xls](#)
[AOPC 15-26_08272010 for DEQ.xls](#)

<<AOPC 1-14_08272010 for DEQ.xls>> <<AOPC 15-26_08272010 for DEQ.xls>> Attached is a draft of the LWG FS Source Control Status Table with the DEQ project team edits and responses per the LWG's request. Please review our comments and forward to the LWG.

The following are general comments/caveats which I ask to have included with the EPA transmittal:

- The source control status table was produced by the LWG at the request of EPA. It is intended to provide a general overview of the status of potential upland sources for the purpose of supporting the in-water feasibility study. DEQ reviewed this document with this use in mind. As the table is an interim summary document, DEQ does not consider the information presented to be final or complete. DEQ is currently overseeing investigations and implementation of source control measures consistent with the DEQ/EPA JSCS at most of the sites. However, source control determinations have not been made for many of these sites. It should be noted that sites, pathways and contaminants may be identified or modified in the future based on on-going evaluations.
- The LWG requested information on a number of sites that are not actively in DEQ's Cleanup Program. DEQ provided updated information where available.
- Redline edits if not provided with references are the opinion of the DEQ project manager.
- Update on ODOT efforts in Portland Harbor

DEQ is in the process of entering into an IGA with ODOT to conduct a Portland Harbor stormwater pathway evaluation; we expect the agreement to be in place in Nov 2010.

ODOT is in the final stages of compiling an inventory/map of all of their "facilities" (i.e., ODOT roads/properties) that may discharge stormwater to the harbor. This includes outfalls they own (only a few of these) and facilities where stormwater runoff reaches the river through a non-ODOT public or private outfall (a couple dozen or so). They expect to have this inventory done by the end of the October and will be able to provide it to the LWG so they can incorporate this info into the table as appropriate.

ODOT also expects to have a report by the end of 2010 that presents additional info about their facilities, general stormwater management

measures, stormwater sampling results, etc. DEQ expects this report to constitute a significant portion of their SCE report and will be reviewing it to determine data gaps/additional measures needed to complete the SCE.

Questions/Comments for EPA

- The LWG instructions for Column N reads: Provides the findings of the SCE and answers the questions below.

- What COIs are the focus of the SCE? In what media?
- Are there exceedances of screening levels for the COIs?
- What are the next steps for the SCE, if applicable?

In the case of a couple of LWG member sites, information in this column reflects conclusions presented in the SCE authored by the member. In those instances (e.g., Arkema) where DEQ did not agree with the SCE, DEQ edited the table field to reflect DEQ SCE conclusions.

- Please confirm that the arsenic, 2-4' DDE and 2-4' DDT should not be included in the list of COIs for AOPC 14.
- Note that DEQ added cyanide, trans-1,2-dichloroethene and MGP TPH to the list of COIs for AOPC 9.

Please let me know if you have any question regarding our table edits.

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